

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OKLAHOMA**

BLAKE HIGGINS,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 11-CV-090-JHP-TLW
)	
STATE AUTO PROPERTY &)	
CASUALTY INSURANCE)	
COMPANY,)	
)	
Defendant.)	

**DEFENDANT STATE AUTO
PROPERTY & CASUALTY INSURANCE COMPANY’S
AMENDED INFORMATION REGARDING THE DEPOSITION OF BRIAN BLAUW**

Defendant State Auto Property & Casualty Insurance Company (“STATE AUTO”) submits its Amended Information Regarding the Deposition of Brian Blauw, pursuant to this Court’s instructions at the pretrial conference conducted on June 28, 2012. STATE AUTO believes that it fulfilled its duty to meet and confer, in a good faith effort to resolve disputes pursuant to LCvR 30.1, but was unable to reach an agreement.

Initially, STATE AUTO requests that this Court exclude the whole of Brian Blauw’s testimony as Mr. Blauw did not handle Plaintiff’s claim for underinsured motorist benefits and was not aware of the claim until after this litigation was filed. As such, Mr. Blauw lacks personal knowledge of Plaintiff’s claim. Further, much of the testimony designated by Plaintiff (and, thus, necessarily counter-designated by STATE AUTO) violates the Court’s rulings on STATE AUTO’s Motions in Limine. Finally, the testimony is cumulative of the anticipated live witness testimony at the jury trial and Plaintiff’s other deposition designations. Subject to these general objections, STATE AUTO submits the following:

Defendant STATE AUTO's Amended Counter-Designations:¹

7:12-18
 9:11-12
 23:21-25
 24:1-2
 36:13-15

Defendant STATE AUTO's Amended Objections:

Subject to the general objections, STATE AUTO specifically objects as follows:

<u>Testimony Designated by Plaintiff</u>	<u>Objections</u>
6:10-25 7:1-3	Relevance; Cumulative evidence
7:12-20	Relevance
7:21-25 8:1	Relevance; Prejudicial; Lack of knowledge/recall
8:2-4, 6	Response to question not designated; Calls for speculation; Opinion without personal knowledge; Ambiguous/vague; Foundation; Lack of knowledge; Prejudicial
9:14-25 10:1-6	Relevance
10:7-9	Relevance; Prejudicial; Lack of knowledge/recall
10:10-18	Relevance; Prejudicial; Asked and answered; Cumulative evidence; Lack of knowledge/recall

¹Amendment to STATE AUTO's Counter-Designations were made solely based upon this Court's ruling, including the Motions for Summary Judgment and Motions in Limine. Should this Court later revise its rulings, STATE AUTO reserves the right to re-urge its original counter-designations. Further, STATE AUTO objects to admission of the related testimony designated by Plaintiff that is excluded or subject to STATE AUTO's Motions in Limine, granted, and/or that may be reurged at trial.

10:19-21, 23-25 11:1	No question; Calls for narrative; Ambiguous/vague; Foundation; Relevance; Lack of knowledge
11:3-7, 8, 10	Argumentative; Relevance; Foundation; Prejudicial; Lack of knowledge
13:13-20	Relevance; Asked and answered; Cumulative evidence; Prejudicial; Lack of knowledge/recall
13:23-25 14:2-3	Relevance; Foundation; Prejudicial
14:4-7	Relevance; Prejudicial
14:8-10	Asked and answered; Relevance; Prejudicial; Cumulative evidence; Lack of knowledge/recall
15:25 16:1-7	Relevance; Improper instruction to witness; Improper use of exhibit
16:8-12	Relevance; Assumes facts not in evidence; Improper instruction to witness; Improper use of exhibit
16:13-16	Relevance; Speculative; Testimony without personal knowledge; Foundation
16:17-21, 23	Argumentative; Relevance; Foundation; Mischaracterizes prior testimony; Unintelligible
16:25 17:1-2, 4-7	Relevance; Foundation; Calls for narrative; No question posed
17:9-12	Cumulative evidence; Narrative; Non-responsive to question posed; Relevance; Ambiguous question
17:13-15, 17	Argumentative; Relevance; Foundation; Assumes facts not in evidence; Prejudicial; Ambiguous question
17:19-22, 24-25 18:1-4	Mischaracterizes prior testimony; Argumentative; Relevance; Foundation; Prejudicial
18:4-7	Relevance; Foundation; Assumes facts not in evidence
18:8-17	Relevance
18:18-20, 22	Lack of recall/knowledge; Relevance; Cumulative evidence; Asked and answered
18:24-25 19:1	Lack of recall/knowledge; Relevance; Foundation; Ambiguous/vague

19:2-4	Relevance; Speculative; Vague/ambiguous ; Motion in Limine relative to the handling of other claims (no. 33) [Docket No. 324]
19:5-7	Relevance; Foundation; Vague/ambiguous
19:8-16	Relevance; Cumulative evidence
20:7-13	Relevance; Prejudicial
21:8-16, 22-25 22:1-2	Relevance; Prejudicial
22:3-9	Relevance; Prejudicial; Cumulative evidence
22:10-15	Relevance; Foundation; Assumes facts not in evidence; Motion in Limine relative to post-litigation conduct (no. 52) [Docket Nos. 140 and 157]
22:16-17, 18	Foundation; Relevance; Assumes facts not in evidence; Motion in Limine relative to post-litigation conduct and handling of other claims (no.52 and no. 33) [Docket Nos. 140, 157, 316, and 324]
22:25 23:1-11	Relevance; Foundation; Motion in Limine relative to post-litigation conduct and handling of other claims (no. 52) [Docket Nos. 140, 157, 316 and 324]
23:12-14, 17-19	Calls for narrative; Vague/ambiguous; Foundation; Motion in Limine relative to handling of other claims (no. 33) [Docket Nos. 140, 157, 316 and 324]
23:21-25 24:1-2	Calls for a legal conclusion; Relevance; Motion in Limine relative to legal conclusions (no. 53) [Docket Nos. 140, 157, and 316]
24:14-15	Calls for a legal conclusion; Relevance; Cumulative evidence; Motion in Limine relative to legal conclusions (no. 53) [Docket Nos. 140, 157 and 316]
24:16-18	Relevance; Foundation; Cumulative evidence; Assumes facts not in evidence; Motion in Limine relative to handling of other claims (no. 33) [Docket Nos. 140 and 324]
25:5-17	Vague/Ambiguous; Relevance; Motion in Limine relative to handling of other claims (no. 33) [Docket No. 140 and 324]
25:22-24 26:2-6	Relevance; Foundation; Vague/ambiguous; Motion in Limine relative to handling of other claims and conduct of other insurers (no. 33 and no. 32) [Docket No. 324]

26:15-16, 18-22	Calls for legal conclusion; Foundation; Vague/ambiguous; Relevance; Motion in Limine relative to legal conclusions (no. 53) [Docket Nos. 140, 157, 316 and 324]
27:15-17, 19-23	Foundation; Vague/ambiguous; Calls for narrative; Asked and answered; Relevance; Motion in Limine relative to handling of other claims (no. 33) [Docket No. 324]
27:25 28:1	Foundation; Asked and answered; Vague/ambiguous; Calls for narrative; Relevance; Motion in Limine relative to handling of other claims (no. 33)[Docket No. 324]
28:2-8	Speculative; Relevance; Calls for narrative; Vague/Ambiguous; Relevance; Motion in Limine relative to handling of other claims (no. 33) [Docket No. 324]
28:9-12, 14-20	Calls for speculation; Opinion without personal knowledge; Vague/ambiguous; Foundation; Relevance; Motion in Limine relative to handling of other claims (no. 33) [Docket No. 324]
28:22-23, 25, 29:1-3	Argumentative; Assumes facts not in evidence; Foundation; Lack of knowledge/recall; Relevance; Motion in Limine relative to tender of partial payment (no.54) [Docket Nos. 316 and 324]
29:4-19	Lack of personal knowledge to testify; Cumulative evidence; Relevance; Vague/ambiguous; Motion in Limine relative to tender of partial payment (no.54) [Docket Nos. 316 and 324]
29:20-22, 24-25 30:1-2	Argumentative; Relevance; Foundation; Ambiguous/vague; Motion in Limine relative to handling of other claims (no.33) [Docket No. 324]
30:4-5, 6	Argumentative; Relevance; Foundation; Lack of knowledge; Vague/ambiguous
30:9-12	Relevance; Cumulative evidence; Motion in Limine relative to handling of other claims (no.33) [Docket No. 324]
30:13-15	Relevance; Cumulative evidence; Vague/ambiguous; Motion in Limine relative to handling of other claims (no.33) [Docket No. 324]
30:16-18, 20	Mischaracterizes prior testimony; Argumentative; Relevance; Prejudicial; Motion in Limine relative to handling of other claims (no.33) [Docket No. 324]
30:21-25 31:1-2	Vague/Ambiguous; Motion in Limine relative to handling of other claims (no.33) [Docket No. 324]

31:3-5, 7-10	Calls for narrative; Foundation; Relevance; Vague/ambiguous; Lack of knowledge; Motion in Limine relative to handling of other claims (no.33) [Docket No. 324]
31:11-17	STATE AUTO requests that the Court strike the extraneous dialogue; Relevance; Foundation; Vague/Ambiguous; Cumulative evidence
31:18-21	Relevance; Foundation; Vague/Ambiguous
31:22-23	STATE AUTO requests that the Court strike the extraneous dialogue; No question posed; Relevance; Vague/ambiguous
31:24-25 32:1	Calls for a legal conclusion; Relevance; Motion in Limine relative to testimony regarding legal conclusions (no.53) [Docket Nos. 140, 157, and 316]
34:10-16	Speculative; Relevance; Prejudicial; Ambiguous/Vague; Foundation; Lack of knowledge
34:17-19, 21	Relevance; Foundation; Ambiguous/Vague; Lack of personal knowledge;
35:6-9, 11-18	Argumentative; Foundation; Relevance; Prejudicial; Lack of personal knowledge; Motion in Limine relative to handling of other claims (no.33) [Docket No. 324]
35:20-22, 23-25 36:1	Foundation; Relevance; Ambiguous/Vague; Prejudicial; Argumentative
36:8-9, 11	Argumentative; Calls for legal conclusion; Calls for speculation; Calls for opinion without personal knowledge; Relevance
36:22-25	Speculative; Relevance; Prejudicial; Vague; Lack of personal knowledge to testify; Motion in Limine relative to the handling of other claims (no.33) [Docket No. 324]
37:1-4, 6-8	Relevance; Foundation; Calls for speculation; Calls for opinion without personal knowledge; Vague/Ambiguous; Prejudicial
37:22-24 38:1	Foundation; Relevance; Vague/ambiguous
38:3-6	Relevance; Cumulative evidence; Vague/ambiguous
38:15-16	Relevance; Prejudicial; Vague/ambiguous
39:11-16	STATE AUTO requests that the Court strike the extraneous dialogue; Relevance
39:17, 19-20	Foundation; Relevance

39:22-23	Relevance; Lack of personal knowledge
39:24-25 40:1-8	Relevance; Prejudicial; Cumulative evidence
40:9-17	Relevance; Motion in Limine relative to stipulations of pending matters (no.6) [Docket No. 324]
40:18-23	Relevance; Lack of recall/knowledge; Vague/ambiguous
41:9-21	Relevance; Vague/ambiguous
41:22-24	Relevance; Cumulative evidence; Prejudicial; Lack of knowledge
41:25 42:1-3	Relevance; Lack of knowledge/recall; Vague/ambiguous; Prejudicial
42:4-11	Relevance
42:12-15	Relevance; Prejudicial; Cumulative evidence; Lack of knowledge/recall
42:16-18	STATE AUTO requests that the Court strike the extraneous dialogue; Relevance; Improper question; Vague/ambiguous
42:19-22	Relevance; Vague/Ambiguous; Lack of knowledge/recall; Prejudicial; Motion in Limine relative to Gold Rule (no.23) [Docket Nos. 324]
42:23-25 43:1-9	Foundation; Relevance; Motion in Limine relative to failure to disclose policy limits (no. 66)[Docket Nos. 140, 157, 316, and 324]
43:10-12, 14	Foundation; Relevance; Motion in Limine relative to failure to disclose policy limits (no.66) [Docket Nos. 140, 157, 316, and 324]
43:16-20	Relevance; Prejudicial; Vague/ambiguous; Motion in Limine relative to Oklahoma Unfair Claims Settlement Practices Act (no.50)[Docket Nos. 140 and 157]
43:21-25 44:1-2	Relevance; Motion in Limine relative to Oklahoma Unfair Claims Settlement Practices Act (no.50)[Docket Nos. 140 and 157]
44:3-4 , 7-9	Foundation; Relevance; Calls for speculation; Calls for opinion without personal knowledge; Lack of knowledge; Vague/ambiguous; Motion in Limine relative to handling of other claims(no.33) [Docket Nos. 324]
44:10-11, 16-24	Relevance
44:25 45:1-3	Relevance; Lack of knowledge/recall
45:4-8	Relevance

45:9, 11	Argumentative; Relevance; Foundation; Assumes facts not in evidence
45:12-25	Relevance; Cumulative evidence
46:1-17	Relevance; Cumulative Evidence; Lack of knowledge
46:18-24	Relevance; Prejudicial; Lack of knowledge; Cumulative evidence
46:25 47:1-7	Relevance; Cumulative evidence
47:8-13, 20-24	Relevance; Cumulative evidence
47:25 48:1-14	Relevance; Cumulative evidence; Motion in Limine relative to stipulations (no.6) [Docket No. 324]
48:15-25 49:1-4	Relevance; Cumulative evidence; Narrative; Prejudicial; Lack of personal knowledge to testify; Foundation; Motion in Limine relative to evidence of Plaintiff's accident (no.51)[Docket Nos. 140, 157 and 316]
49:5-7	Relevance; Speculative; Lack of personal knowledge to testify; Prejudicial
50:4-8	Relevance; Vague/ambiguous; Lack of personal knowledge; Cumulative evidence
50:9-18	Relevance; Cumulative evidence; Motion in Limine relative to stipulations (no.6) [Docket Nos. 140 and 324]
50:19-22, 24	Foundation; Relevance; Lack of knowledge; Vague/ambiguous
51:1-6	Relevance; Vague/ambiguous; Cumulative evidence
51:7-9, 11-12	Foundation; Relevance; Vague/ambiguous
51:13-18	STATE AUTO requests that the Court strike the extraneous dialogue; Relevance; Improper question; Vague/ambiguous
51:19-22	Relevance; Cumulative evidence
51:23-25 52:1-6	Speculative; Relevance; Prejudicial; Improper question
52:7-9, 11-17	Calls for speculation; Relevance; Leading; Vague/ambiguous
52:19-22, 24 53:1-3	Argumentative; Leading; Relevance; Foundation; Vague/ambiguous
53:4, 6	Relevance; Calls for speculation; Calls for opinion without personal knowledge; Foundation; Vague/ambiguous; Motion in Limine relative to handling of other claims (no.33)[Docket Nos. 140, 157, and 316]

53:8-9, 11-14	Relevance; Foundation; Calls for speculation; Vague/ambiguous; Cumulative evidence
53:15-17, 18, 22-23	Foundation; Vague/ambiguous; Calls for speculation; Relevance; Calls for speculation
53:25 54:1-2, 5-6	Mischaracterizes prior testimony; Relevance; Foundation; Lack of personal knowledge; Argumentative; Vague/ambiguous
54:7-12	Relevance; Speculative; Prejudicial; Vague/ambiguous; Foundation; Motion in Limine relative to handling of other claims (no.33) [Docket Nos. 140 and 324]
54:13-18	Relevance; Cumulative; Harassment; Vague/ambiguous; Foundation; Motion in Limine [Docket Nos. 140, 157, and 324]
54:19-21	Relevance; Cumulative; Speculative; Personal knowledge to testify; Vague/ambiguous; Foundation; Motion in Limine relative to handling of other claims (no.33) [Docket Nos. 140 and 324]
54:22-25 55:1-7	Relevance; Cumulative; Speculative; Personal knowledge to testify; Vague/ambiguous; Foundation;
55:8-11	Relevance; Prejudicial; Cumulative
55:12-15	Relevance; Speculative
55:16-22	Relevance; Speculative; Cumulative
55:23-25 56:1-8	Relevance; Speculative; Narrative; Lack of personal knowledge to testify; Motion in Limine relative to handling of other claims (no.33)[Docket No. 324]
56:9-10, 12-13	Assumes facts not in evidence; Argumentative; Leading; Foundation; Relevance
56:15, 17-18	Asked and answered; Foundation; Relevance
56:19-24	Relevance; Cumulative evidence; Question states legal conclusion; Motion in Limine relative to Oklahoma Unfair Claims Settlement Practices Act (no.50) [Docket Nos. 140, 157, and 316]
56:25 57:1-3	Calls for a legal conclusion; Relevance; Lack of knowledge/recall; Question misstates Oklahoma law; Motion in Limine relative to Oklahoma Unfair Claims Settlement Practices Act and legal conclusions (no.50) [Docket Nos. 140, 157, and 316]
57:4-6, 8	Foundation; Relevance; Argumentative; Prejudicial

57:24-25 58:1, 3-7	Foundation; Relevance; Vague/ambiguous; Cumulative evidence
58:8-10, 12	Leading; Argumentative; Foundation; Asked and answered; Relevance; Vague/ambiguous
58:13-16, 18	Foundation; Relevance; Motion in Limine relative to handling of other claims (no.33)[Docket Nos. 140, 157, and 324]
58:19-25 59:1-3	STATE AUTO requests that the Court strike the extraneous dialogue; Improper question; Vague/ambiguous; Relevance
59:4-12	Relevance; Prejudicial; Vague/ambiguous
59:13-16	Relevance; Motion in Limine relative to stipulations (no.6)[Docket Nos. 140 and 324]
59:18-19, 22	Calls for speculation; Opinion without personal knowledge; Lack of knowledge; Foundation; Relevance; Prejudicial; Confusing
59:23-25 60:2-5	Argumentative; Relevance; Foundation; Assumes facts not in evidence; Vague/ambiguous
60:6-11	Relevance; Cumulative evidence; Lack of knowledge/recall
60:12-13, 15-17	Asked and answered; Lack of knowledge; Foundation; Relevance; Vague/ambiguous
60:18-22, 24-25 61:1	Calls for speculation; Narrative; Asked and answered; Opinion without personal knowledge; Foundation; Relevance; Lack of knowledge; Argumentative
61:2-3, 5	Mischaracterizes prior testimony; Relevance; Foundation; Argumentative; Prejudicial
61:6-11	Relevance; Prejudicial; Answer is not responsive to question posed; Lack of personal knowledge to testify; Mischaracterizes prior testimony
61:12, 14	Foundation; Relevance; Calls for speculation; Prejudicial
61:15-18	Relevance; Calls of speculation; Prejudicial
61:19-21, 24-25	Foundation; Relevance; Assumes facts not in evidence; Argumentative; No question posed
62:1-4, 6	Foundation; Relevance; Prejudicial; Misstates prior testimony; Vague/ambiguous

62:15-25 63:1-2	Relevance; Personal knowledge to testify; Speculative; Motion in Limine relative to legal conclusions(no.53) [Docket Nos. 140, 157, and 324]; Calls for a legal conclusion
63:3-5	Relevance; Prejudicial; Speculative; Personal knowledge to testify
63:6-8	Vague/Ambiguous; Relevance
63:9-12	Relevance; Motion in Limine relative to post-litigation conduct (no. 52)[Docket Nos. 140, 157, and 316]
63:13-14	Relevance
64:24-25 65:1-3, 5	Relevance; Cumulative evidence; Asked and answered; Vague/Ambiguous
65:7-24	Relevance; Motion in Limine relative to reserves (no.49)[Docket No. 316]
65:25 66:1-2, 10-13	Argumentative; Foundation; Relevance; Cumulative evidence; Motion in Limine relative to reserves (no.49)[Docket No. 316]
66:14-25 67:1-8	Relevance; Cumulative evidence; Motion in Limine relative to reserves (no.49) [Docket No. 316]
67:22-25	Relevance; Hearsay; Foundation; Motion in Limine relative to reserves (no.49) [Docket No. 316]
68:1-9	Relevance; Speculative; Motion in Limine relative to reserves (no.49)[Docket No. 316]
68:10-20	Relevance; Speculative; Personal knowledge to testify; Motion in Limine relative to reserves (no.49) [Docket No. 316]
68:21-24, 25	Foundation; Ambiguous/vague; Relevance; Personal knowledge to testify
69:3-6	Relevance; Speculative; Cumulative evidence; Personal knowledge to testify; Foundation
69:10-13, 15-20	No question posed; Calls for narrative; Relevance; Lack of recall/knowledge; Asked and answered
69:21-24	Relevance; Speculative; Foundation; Motion in Limine [Docket Nos. 140 and 157]
69:25 70:1-3, 5	Foundation; Relevance; Calls for speculation; Vague/ambiguous
70:7-13	Relevance; Lack of knowledge/recall; Prejudicial; Motion in Limine relative to reserves (no.49) [Docket Nos. 316]

72:8-10, 12-15	Foundation; Relevance; Prejudicial; Motion in Limine relative to reasons why State Auto employees terminated employment (no.62)[Docket Nos. 316]
74:2-5, 7	Argumentative; Foundation; Relevance; Assumes facts not in evidence; Motion in Limine relative to letters after Plaintiff retained counsel (no.57)[Docket Nos. 140, 157, and 316]
74:8-10, 12-14	Calls for speculation; Foundation; Relevance; Prejudicial; Cumulative evidence; Motion in Limine relative to letters after Plaintiff retained counsel (no.57)[Docket Nos. 140, 157, and 316]
75:3-5, 7-9	Relevance; Foundation; Vague/ambiguous; Prejudicial; Motion in Limine relative to State Auto employee compensation(no.30) [Docket No. 324]
75:10-13, 15-22	Lack of knowledge/ recall; Calls for speculation; Calls for opinion without personal knowledge; Vague; Foundation; Relevance; Prejudicial; Motion in Limine relative to State Auto employee compensation(no.30) [Docket No. 324]
76:14-15, 17-21	Relevance; Foundation; Vague/ambiguous; Lack of personal knowledge; Motion in Limine and Motion for Summary Judgment relative to punitive damages [Docket No. 288 and 324]
77:24 78:1, 3-4	Relevance; Foundation; Motion in Limine relative to State Auto employee compensation (no.30) [Docket No. 324]
78:5-8, 10	Relevance; Foundation; Vague/ambiguous; Lack of personal knowledge; Motion in Limine relative to State Auto employee compensation(no.30) [Docket No. 324]
78:11-14, 16	Relevance; Foundation; Prejudicial; Speculation; Lack of personal knowledge; Motion in Limine relative to State Auto employee compensation (no.30) [Docket No. 324]
78:18-19, 20	Argumentative; Leading; Relevance; Foundation; Motion in Limine and Motion for Summary Judgment relative to punitive damages [Docket Nos. 140, 288, and 324]
79:6-8	Relevance; Cumulative evidence; Prejudicial; Motion in Limine and Motion for Summary Judgment relative to punitive damages [Docket Nos. 140, 288, and 324]
79:9-10	Relevance; Speculative; Lack of knowledge/recall; Motion in Limine and Motion for Summary Judgment relative to punitive damages [Docket Nos. 140, 288, and 324]

80:6-7, 9-11	Relevance; Foundation; Vague/ambiguous; Lack of knowledge/recall; Prejudicial; Motion in Limine relative to handling of other claims (no.33)[Docket No. 140 and 324]
80:12-18	Relevance; Prejudicial; Narrative; Vague/ambiguous; Motion in Limine relative to handling of other claims (no.33)[Docket No. 140 and 324]
80:19-20, 21	Argumentative; Foundation; Relevance; Calls for speculation; Motion in Limine relative to handling of other claims (no.33)[Docket No. 140 and 324]
80:25 81:1	Argumentative; Relevance; Prejudicial; Motion in Limine relative to handling of other claims (no.33) [Docket No. 140 and 324]
81:13-14, 16	Foundation; Relevance; Vague/ambiguous; Motion in Limine relative to handling of other claims and post-litigation conduct (no.33 and no. 52) [Docket No. 316 and 324]
81:17-21	Relevance; Cumulative evidence; Motion in Limine relative to handling of other claims and post-litigation conduct (no.33 and no. 52)[Docket No. 316 and 324]
81:22, 24-25	Foundation; Relevance; Motion in Limine relative to handling of other claims (no.33) [Docket No. 324]
82:1-5	Relevance; Prejudicial; Personal knowledge to testify; Foundation; Motion in Limine and Motion for Summary Judgment relative to punitive damages [Docket Nos. 140, 288, and 324]
82:6-8, 10	Argumentative; Leading; Foundation; Relevance; Prejudicial/confusing; Motion in Limine and Motion for Summary Judgment relative to punitive damages [Docket Nos. 288 and 324]
82:11-12, 14	Calls for speculation; Calls for opinion without personal knowledge; Foundation; Relevance; Prejudicial; Motion in Limine and Motion for Summary Judgment relative to punitive damages [Docket Nos. 288 and 324]
82:16-17, 19-20	Foundation; Relevance; Lack of knowledge/recall; Prejudicial; Motion in Limine relative to State Auto employee compensation (no.30) [Docket No. 324]
82:21-22, 24	Asked and answered; Relevance; Prejudicial; Motion in Limine relative to State Auto employee compensation (no.30)[Docket No. 324]
83:1-3	Relevance; Cumulative evidence; Ambiguous; Prejudicial; Motion in Limine relative to State Auto employee compensation (no.30)[Docket No. 324]

83:4, 6-11	Foundation; Relevance; Lack of knowledge/recall; Prejudicial; Motion in Limine relative to State Auto employee compensation (no.30)[Docket No. 324]
83:12-15	Relevance; Cumulative evidence; Prejudicial; Motion in Limine relative to State Auto employee compensation and punitive damages (no.30)[Docket No. 288 and 324]
84:16-25 85:13-25 86:1-7	STATE AUTO requests that the Court strike the extraneous dialogue; Vague/ambiguous; Improper question; Relevance; Prejudicial; Motion in Limine relative to stipulations(no.6) [Docket No. 324]

Respectfully submitted,

ROBINETT & MURPHY

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Certificate of Service

I hereby certify that on August 1, 2012, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing. Based on the records currently on file, the Clerk of the Court will transmit a Notice of Electronic Filing to the following ECF registrants:

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